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April 29, 2013

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte* Presentation In the Matter of Connect America Fund WC Docket No. 10-90; Establishing Just and Reasonable Rates for Local Exchange Carriers WC Docket No. 07-135; High-Cost Universal Service Support WC Docket No. 05-337; Developing an Unified Intercarrier Compensation Regime CC Docket No. 01-92; Federal-State Joint Board on Universal Service CC Docket No. 96-45; Rural Call Completion, WC Docket No. 13-39

Dear Ms. Dortch:

On behalf of the Rural Broadband Alliance (“RBA”), Greg Berberich, Chief Executive Officer of the Matanuska Telephone Association, Inc. and Co-Chairman of the RBA, and I met with Priscilla Delgado Argeris, Legal Advisor to Commissioner Rosenworcel, on April 25, 2013. We expressed the appreciation of the RBA members both for the observations that Commissioner Rosenworcel has set forth regarding the impact on investment in network infrastructure in rural areas that has resulted from the Commission rules established in the *USF/ICC Transformation Order*, and for her continuing efforts to address these concerns.

Mr. Berberich and I discussed how the FCC’s new rules continue to place rural service providers in jeopardy by reducing their recovery of the much-needed investments they have made in their rural communities. As a result of the financial instability that has been imposed on the rural telecom industry, broadband infrastructure investment in rural America has been chilled.

We urged that Commissioner Rosenworcel and her colleagues take additional actions to achieve Commissioner Rosenworcel’s objective of simplifying the rules in a manner that is both fiscally sound and good for rural consumers while also providing incentives to investment.

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Mr. Berberich and I also briefly discussed concerns regarding rural call completion. We noted that RBA members have reported increased incidents of rural call completion problems subsequent to the Commission's March 12, 2013, announcement of an agreement with Level 3. In a press release entitled "Level 3 Agrees To Adopt Rigorous New Call Completion Standards And Provide Rural Call Completion Data, Resolving FCC Investigation," the Commission reported that Level 3 has agreed to "Complete long-distance calls to incumbent local exchange carriers in rural areas at a rate within 5% of that in non-rural areas over a two-year period."

We noted that the industry standard throughout the nation, including rural areas, is 99.99999% call completion. Mr. Berberich and I expressed concern that the agreement reached by the FCC with Level 3 has essentially harmed consumers by sending carriers a signal that the Commission accepts a much lower standard of call completion with regard to calls directed to rural areas served by rural incumbent local exchange carriers. We urged that Commissioner Rosenworcel and her colleagues take expedient action to clarify that the Commission will not sanction or tolerate a diminished standard.

Mr. Berberich and I also noted that rural local exchange carriers continue to bear the misdirected brunt and burden of consumer complaints regarding call completion failures. Although the Commission's web site offers consumers a lengthy discussion about the call completion issue in rural areas, the site does not provide consumers with clear information disclosing that the Commission has recognized that the call completion issues are not caused by any failure of the terminating local rural carrier networks. The website provides consumers with a link to enable the filing of online complaints, but it does not provide consumers with any clear guidance that the complaint should not be directed against the terminating rural service provider.

As a result, both consumers making calls to rural areas and the rural consumers and rural businesses they are calling continue to be misinformed, and misdirect both their ire and FCC complaints against rural carriers. Accordingly, we urged that Commissioner Rosenworcel and her colleagues take action to ensure that the Commission's website and informal complaint processes are improved in order to provide consumers with more complete, concise and correct information.

I am filing this letter electronically with your office for inclusion in the record of each of the above-referenced proceedings pursuant to the Commission's Rules. If you have any questions, please do not hesitate to contact me at 202-333-1770.

Sincerely,

s/ Stephen G. Kraskin

Attachments

cc: Priscilla Delgado Argeris